

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ABC Corporation I et al,

*Plaintiff,*

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

*Defendants.*

**CASE NO.** 1:20-cv-04806

**Judge:** Honorable Thomas M. Durkin

**DEFENDANT GYROOR-US’S MOTION FOR LEAVE TO FILE AN  
OVER-LENGTH BRIEF IN EXCESS OF 15 PAGES**

Pursuant to Local Rule 7.1, Dongguan Saibotant Energy Tech Co., Ltd. (hereinafter, “Gyroor-US” or “Defendant”), by and through undersigned counsel, and hereby respectfully move the Court for leave to file an over-length brief in Opposition to Plaintiffs’ motion for Preliminary injunction. [Dkt. No. 592].

Plaintiffs alleged infringement against three products sold by Defendant, purposefully included non-accused products in their Motion for preliminary injunction, such as “Accused Product Gyroor C” (i.e., Gyroor T580 series and variants), and “Accused Product Gyroor E” (i.e., Gyroor G11 series and variants). [Dkt. 593].

To conduct proper design patent infringement analysis, additional pages are necessary to compare the figures and graphics of the prior arts, patents-in-suit and three kinds of accused products. This brief in opposition contains necessary substantive authorities and analysis relevant to Defendant’s noninfringement analysis.

Likewise, Defendant did not object to Plaintiffs' motion for leave to file excess pages of their motion for preliminary injunction. Also, should Plaintiffs seek additional pages to reply, Defendant will not object to the request for an over-length reply brief.

WHEREFORE, for the reasons set forth above, Defendant respectfully requests that this Court grant its motion for leave to file an over-length brief.

Date: 11/28/2022

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/s/ Yu Hao Yao

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this November 28, 2022, I electronically filed the foregoing file with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel of record and interested parties through this system, which will deliver a true and correct copy of the foregoing documents via CM/ECF.

Date: 11/28/2022

/s/ Yu Hao Yao